

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

THANH THACH,

Plaintiff,

CIVIL NO. 3:14-cv-070

v.

**EQUIFAX INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS, INC.,
BRYANT STATE BANK, CREDIT ONE BANK,
COMENITY BANK, FIRST PREMIER BANK,
LVNV FUNDING, LLC.,**

Defendants.

**DEFENDANT EQUIFAX INFORMATION SERVICES, LLC'S
SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES**

Defendant, Equifax Information Services LLC ("Equifax"), hereby supplements its responses to Plaintiff Thanh Thach's First Interrogatories as follows:

OBJECTIONS

Equifax hereby incorporates its previously served objections to Plaintiff's First Set of Interrogatories, as if fully set forth herein.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 2:

Did Equifax ever receive or send any written or non-written communication from or to the Plaintiff or any other person pertaining to the Plaintiff? If so, specifically list and identify each such communication. For non-written communications, state the content of each such communication. For written communications, identify in your answer to this Interrogatory the document and the date of receipt for each document so identified.

RESPONSE TO INTERROGATORY NO. 2:

Subject to its previously served objections and supplementing its previous response to Interrogatory No. 2, Equifax identifies the following individuals who are listed in the ACIS

cases: Pamela Smith, Equifax, Atlanta, Georgia; Neeraj Sharma, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Rahul Singh, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Jose Duran, Equifax Costa Rica, #4-17004 Bldg 1F, Section D Metro Free Zone, San Jose, Costa Rica; Manoj Yadav, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Priyanka Rana, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Pradeep Upadhyay, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Devendra Paul (employment status, unknown), Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Dheeraj Sharma, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Md Asid, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; Pravin Kumar, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India; and Manoj Prajapati, Intelenet Global Services Private Limited, Intelenet Towers 1406-a/8, Mindspace, Malad West Mumbai – 400 064, India.

Pamela Smith may be contacted through undersigned counsel.

INTERROGATORY NO. 13:

State the net income and net worth of *Equifax* for the preceding 24 quarters.

RESPONSE TO INTERROGATORY NO. 13:

Subject to and without waiving its previously served objections, Equifax will provide a stipulation of net worth.

Respectfully submitted this 20th day of August, 2014.

/s/ John W. Montgomery, Jr.
John W. Montgomery, Jr.
Virginia State Bar No. 37149
John W. Montgomery, Jr., APC
2116 Dabney Road, Suite A-1
Richmond, VA 23230
Telephone (804) 355-8744
Facsimile (804) 355-8748
Email: jmontgomery@jwm-law.com

Barry Goheen*
J. Anthony Love*
Ian E. Smith*
King & Spalding LLP
1180 Peachtree Street NE
Atlanta, Georgia 30309-3521
Telephone (404) 572-4600
Facsimile (404) 572-5100
Email: bgoheen@kslaw.com
Email: tlove@kslaw.com
Email: iesmith@kslaw.com
* Admitted *Pro Hac Vice*

Counsel for Defendant Equifax Information Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2014, a true and correct copy of the foregoing was sent via electronic mail to the following counsel of record:

Joseph William Clark
Edward Mark Wenger
Jones Day (DC)
51 Louisiana Ave NW
Washington, DC 20001
Email: jwclark@jonesday.com

Timothy James St. George
Troutman Sanders LLP
Troutman Sanders Bldg
1001 Haxall Point
Richmond, VA 23219
Email: tim.stgeorge@troutmansanders.com
Counsel for Experian Information Solutions, Inc.

Leonard A. Bennett, Esq.
Susan M. Rotkis, Esq.
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
E-mail: lenbennettgclalegal.com
E-mail: srotkisj@clalegal.com

Casey Shannon Nash
Matthew James Erausquin
Consumer Litigation Associates, P.C.
1800 Diagonal Rd., Suite 600
Alexandria, VA 22314

Kristi C. Kelly
Andrew Joseph Guzzo
Kelly & Crandall, PLC
4084 University Drive Suite 202A
Fairfax, VA 22030
E-mail: aguzzo@kellyandcrandall.com
E-mail: kkelly@kellyanderandall.com
Counsel for Plaintiff

/s/Ian E. Smith
Ian E. Smith
Counsel for Equifax Information Services LLC